

1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF OKLAHOMA
3
4

5 W. A. DREW EDMONDSON, in his)
6 capacity as ATTORNEY GENERAL)
7 OF THE STATE OF OKLAHOMA and)
8 OKLAHOMA SECRETARY OF THE)
9 ENVIRONMENT C. MILES TOLBERT,)
10 in his capacity as the)
11 TRUSTEE FOR NATURAL RESOURCES)
12 FOR THE STATE OF OKLAHOMA,)

13 Plaintiff,)
14)

15 vs.)

16 4:05-CV-00329-TCK-SAJ
17)

18 TYSON FOODS, INC., et al,)
19)

20 Defendants.)
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27 THE DEPOSITION OF BILL RAY
28 ANDERSON, produced as a witness on behalf of the
29 Plaintiff in the above styled and numbered cause,
30 taken on the 10th day of July, 2007, in the City of
31 West Siloam Springs, County of Delaware, State of
32 Oklahoma, before me, Lisa A. Steinmeyer, a Certified
33 Shorthand Reporter, duly certified under and by
34 virtue of the laws of the State of Oklahoma.
35

1 gave today at the beginning of this deposition; is

2 that the location you started?

3 A One of them.

4 Q All right, and the other one was where?

5 A Where I live now.

09:15AM

6 Q Okay. Where you live now has the pullet
7 farms?

8 A Yes.

9 Q What is the other farm then that we're
10 referring to?

09:15AM

11 A The layer farm.

12 Q Glare?

13 A Layer, layer farm.

14 Q Layer farm, I'm sorry, and that's the property
15 down on Flint Creek in Section 9; correct?

09:15AM

16 A Yes.

17 Q In part of Section 9?

18 A Yes, I think.

19 Q Have you worked for any other poultry
20 integrator besides Cobb and now known as Tyson?

09:16AM

21 A No.

22 MR. WILLIAMS: Object to the form.

23 Q What was the name of the first integrator that
24 you grew chickens or poultry for?

25 A Cobb.

09:16AM

1 Q You identified occasionally you get a bonus,
2 recently that is?

3 A Yes.

4 Q And we've identified the document that
5 described this equipment reimbursement from Cobb.
6 Other than those three examples, can you think of
7 any other type of financial, either assistance,
8 reward or benefit?

03:02PM

9 A Not offhand I can't.

10 Q Have they -- has Cobb assisted you in any way
11 to finance any other part of your poultry operations
12 besides the one document we saw on equipment
13 reimbursement?

03:02PM

14 A No.

15 Q Are you a member of Poultry Partners?

03:03PM

16 A Yes.

17 Q When did you join?

18 A Oh, I don't remember.

19 Q When you did, did you pay any money to Poultry
20 Partners in the way of dues or a donation?

03:03PM

21 A No.

22 Q Have you paid any since?

23 A No.

24 Q Do you know if Betty has paid any?

25 A No.

03:03PM